

1 MCGREGOR W. SCOTT  
United States Attorney  
2 ALEXANDRE DEMPSEY  
Assistant United States Attorney  
3 2500 Tulare Street, Suite 4401  
Fresno, CA 93721  
4 Telephone: (559) 497-4000  
Facsimile: (559) 497-4099

5 Attorneys for Plaintiff  
6 United States of America

7  
8 IN THE UNITED STATES DISTRICT COURT  
9 EASTERN DISTRICT OF CALIFORNIA

10 UNITED STATES OF AMERICA,  
11  
12 Plaintiff,  
13 v.  
14 JOAQUIN VELASCO  
Defendants.

CASE NO. 1:20-MJ-00044-SAB

STIPULATION AND PROTECTIVE ORDER  
BETWEEN THE UNITED STATES AND  
DEFENDANT JOAQUIN VELASCO

COURT: Hon. Sheila K. Oberto

15 WHEREAS, the discovery in this case is voluminous and contains a large amount of personal  
16 and confidential information including but not limited to dates of birth, telephone numbers, residential  
17 addresses, and social security numbers (“Protected Information”); and

18 WHEREAS, the parties desire to avoid both the necessity of large scale redactions and the  
19 unauthorized disclosure or dissemination of this information to anyone not a party to the court  
20 proceedings in this matter;

21 The parties agree that entry of a stipulated protective order is appropriate.

22 THEREFORE, Defendant JOAQUIN VELASCO, by and through his counsel of record Darryl  
23 Young (“Defense Counsel”), and the United States of America, by and through Assistant United States  
24 Attorney Alexandre Dempsey, hereby agree and stipulate as follows:

25 1. This Court may enter a protective order pursuant to Rule 16(d) of the Federal Rules of  
26 Criminal Procedure, and its general supervisory authority.  
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2. This Order pertains to all discovery provided to or made available to Defense Counsel as part of discovery in this case (hereafter, collectively known as “the discovery”).

3. By signing this Stipulation and Protective Order, Defense Counsel agrees not to share any documents that contain Protected Information with anyone other than Defense Counsel attorneys, designated defense investigators, and support staff. Defense Counsel may permit the Defendant to view unredacted documents in the presence of his attorney, defense investigators, and support staff. The parties agree that Defense Counsel, defense investigators, and support staff shall not allow the Defendant to copy Protected Information contained in the discovery. The parties agree that Defense Counsel, defense investigators, and support staff may provide the Defendant with copies of documents from which all Protected Information has been redacted.

4. The discovery and information therein may be used only in connection with the litigation of this case and for no other purpose. The discovery is now and will forever remain the property of the United States of America (“Government”).

5. Defense Counsel will store the discovery in a secure place and will use reasonable care to ensure that it is not disclosed to third persons in violation of this agreement.

6. Defense Counsel shall be responsible for advising the Defendant, employees, and other members of the defense team, and defense witnesses of the contents of this Stipulation and Order.

7. In the event that Defendant substitutes counsel, undersigned Defense Counsel agrees to withhold discovery from new counsel unless and until substituted counsel agrees also to be bound by this Order.

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1 IT IS SO STIPULATED.

2 Dated: July 21, 2020

MCGREGOR W. SCOTT  
United States Attorney

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4 By: /s/ALEXANDRE DEMPSEY  
ALEXANDRE DEMPSEY  
Assistant United States Attorney

5  
6  
7 Dated: July 21, 2020

By: /s/DARRYL YOUNG  
DARRYL YOUNG  
Attorney for Defendant  
JOAQUIN VELASCO

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10 IT IS SO ORDERED.

11  
12 Dated: July 21, 2020

/s/ Sheila K. Oberto  
UNITED STATES MAGISTRATE JUDGE